

April 4, 2011

Mr. Roger Kiers  
Cultural Resources Specialist - Archaeologist  
WSDOT Environmental Services Office  
PO Box 47332, Olympia, WA 98504-7332

RE: McMillin Bridge Removal

Dear Mr. Kiers,

Last year, the Washington Trust for Historic Preservation accepted an invitation from WSDOT to serve as a consulting party for the Section 106 process as it relates to removal of the McMillin Bridge on SR 162. The Washington Trust is an advocacy organization dedicated to preserving historic and cultural resources across the state. In this role, we have serious concerns with the Alternatives for Preservation WSDOT has presented to date, outlined in a memorandum from Steve Fuchs to you on September 3, 2010.

The September 3, 2010 memo outlined six options described as Alternatives for Preservation. One of these, Option 5, describes demolition of the bridge. Demolition is not an Alternative for Preservation and should not be included on this list. The remaining options, Options 1-4 along with Option 6, do describe scenarios that could be considered Alternatives for Preservation. Yet the memo includes reasons why each of these remaining options are either infeasible or impractical, implying that demolition is the only possible action moving forward. To be able to fully consider the Alternatives for Preservation, a much more comprehensive analysis must be conducted for each option, along with development of other options not previously considered.

Our biggest concern with the Section 106 process to date has been the lack of consultation. WSDOT has established an ftp site for the purpose of cataloguing and making available all correspondence on the issue and notifications are sent to all consulting parties as additional documentation becomes available, but there has not been an opportunity for consulting parties to meaningfully engage in the process thus far. As a consulting party, the Washington Trust expects to play a role in developing and vetting alternatives to demolition; to be kept apprised of new project developments such as studies, analyses, or findings; to attend meetings and/or presentations for project updates; and be notified of the timeframe and schedule for project implementation.

The Washington Trust fully understands WSDOT's role and the role of the US Army Corps of Engineers (USACE), acting as the lead federal agency, related to the Section 106 process. It is the responsibility of WSDOT to meaningfully engage with all stakeholders who, by invitation or request, serve as consulting parties. From our viewpoint, based on documentation and

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correspondence submitted thus far, it appears that WSDOT considers the removal of the bridge to be a *fait accompli*, with consultation designed to convince stakeholders of the necessity of removal rather than engage in a discussion of possible alternative scenarios.

Rather than provide further comment on proposed alternatives, the Washington Trust looks forward to being involved in developing these alternatives, analyzing pros and cons different scenarios may hold, and discussing mitigation measures should a finding of adverse effects be associated with the project.

Finally, the Washington Trust did receive a nomination to include the McMillin Bridge in our 2011 Most Endangered Historic Properties List. Inclusion in this list is designed to raise awareness about specific challenges facing historic resources. The 2011 list will be announced in May as part of our activities associated with Preservation Month.

Thank you for the opportunity to comment on this important matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Moore".

Chris Moore  
Field Director

CC: Sandra Manning, USACE  
Chris Jenkins, USACE  
Lauren McCroskey, USACE  
Matthew Sterner, DAHP  
Brian Turner, Western Region, National Trust for Historic Preservation  
Kitty Henderson, Historic Bridge Foundation